

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

TOMMY STRONG

PLAINTIFF

VS.

CIVIL ACTION NUMBER 3:11 - CV - 705 - DPJ - FKB

BASS PRO SHOP, EASTMAN OUTDOORS,
INC. AND JOHN DOES 1-10

DEFENDANTS

PLAINTIFF'S EXPERT DESIGNATION

COMES NOW Plaintiff, Tommy Strong, by and through counsel, MORGAN & MORGAN, P.A., pursuant to the applicable provisions of the Rule 26 of the Federal Rules Of Civil Procedure, hereby files this his Expert Designation in the above styled and numbered civil action, and in support thereof would aver as follows:

1. The University of Mississippi Medical Center
2500 North State Street
Jackson, Mississippi 39216

Plaintiff designates The University of Mississippi Medical Center and all attending and / or treating physicians who treated and cared for Mr. Strong as a result of a certain arrow snapping and lodging into his hand that occurred on or about October 5, 2008. The attending and treating physicians' opinion (s) and testimony (ies) is / are based specifically upon (a) their treatment, diagnosis, and prognosis of Plaintiff; (b) their knowledge, skill, and training in the field of physical medicine; (c) a reasonable degree of medical probability and (d) Plaintiff's medical records and bills. The attending and treating physician (s) will also testify to the reasonableness and necessity of said medical bills. Plaintiff respectfully states that he has previously produced medical records and bills with his responses to Defendants' First Set Of Requests For Production Of Documents, but an additional set are attached to the instant expert designation and identified as Exhibit 1.

2. University Physicians
2500 North State Street
Jackson, Mississippi 39216

Plaintiff designates University Physicians and all attending and / or treating physicians who treated and cared for Mr. Strong as a result of a certain arrow snapping and lodging into his hand on or about October 5, 2008. The attending and / or treating physicians' opinion (s) and testimony (ies) is / are based upon (a) their treatment, diagnosis, and prognosis of Plaintiff; (b) their knowledge, skill, and training in the field of physical medicine; (c) a reasonable degree of medical probability and (d) Plaintiff's medical records and bills. The attending and / or treating physicians will also testify to the reasonableness and necessity of said medical bills. Plaintiff previously produced medical records and bills with his responses to Defendants' First Set Of Requests For Production Of Documents, but an additional set are attached to the instant expert designation and identified as Exhibit 1.

3. Farhad Booeshaghi, Ph. D, P.E.
Global Engineering Solutions – Scientific Solutions
2777 Miccosukee Road
Tallahassee, Florida 32308

See attached opinion report and curriculum vitae identified as Exhibits 2 and 3 respectively.

4. Plaintiff respectfully reserves the right to call any and all persons designated by Defendants as expert witnesses.

Respectfully submitted this the 30th day 29th day of November, 2012.

TOMMY STRONG, PLAINTIFF

By: s/ Brandon I. Dorsey
BRANDON I. DORSEY, MSB # 100291
ATTORNEY FOR PLAINTIFF

OF COUNSEL:

Brandon I. Dorsey, MSB# 100291
MORGAN & MORGAN, P.A.
188 E. Capitol Street, Ste. 777
Jackson, Mississippi 39201
Telephone: (601) 949-3388
Facsimile: (601) 949-3399

CERTIFICATE OF SERVICE

I, Omar L. Nelson, do hereby certify that I have this day caused to be mailed by the United States Postal Service, postage prepaid, a true and correct copy of the above and foregoing document to:

Roy A. Smith, Esquire
Steven J. Griffin, Esquire
DANIEL COKER HORTON & BELL, P.A.
Post Office Box 1084
Jackson, Mississippi 39215-1084

This the 30th day of November, 2012.

s/ Brandon I. Dorsey
BRANDON I. DORSEY